

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHERI MINARSKY, :
v. Plaintiff : CIVIL ACTION - LAW
SUSQUEHANNA COUNTY : JURY TRIAL DEMANDED
AND : JUDGE: ROBERT D. MARIANI
THOMAS YADLOSKY, JR., :
Defendants : NO. 3:14-CV-02021

DEFENDANT SUSQUEHANNA COUNTY'S PROPOSED
VERDICT SLIP

Part I

1. Did Sheri Minarsky prove by a preponderance of the evidence that she was subjected to unlawful harassment by Thomas Yadlosky on the basis of her gender?

YES_____ NO_____

If you answered "No" to question #1, proceed to Part II. If you answered "Yes" to question #1, proceed to question #2.

2. Did Sheri Minarsky prove by a preponderance of the evidence that the unlawful harassment by Thomas Yadlosky created a hostile work environment?

YES_____ NO_____

If you answered "No" to question #2, proceed to Part II. If you answered "Yes" to question #2, proceed to question #3.

3. Did Susquehanna County prove by a preponderance of the evidence that Susquehanna County exercised reasonable care to prevent harassment in the workplace on the basis of sex, and also exercised reasonable care to promptly correct any harassing behavior that does occur?

YES _____ NO _____

4. Did Susquehanna County prove by a preponderance of the evidence that Sheri Minarsky unreasonably fail to take advantage of any preventive or corrective opportunities provided by Susquehanna County?

YES _____ NO _____

If you answered “No” to either question #3 or #4, proceed to question #5. If you answered “Yes” to questions #3 and #4, proceed to Part II.

5. If you find that Sheri Minarsky failed to prove compensatory damages, then you must award nominal damages of \$1.00. Therefore, if you find that Sheri Minarsky was deprived of this federal right but suffered no actual injury as a result of that deprivation, you must enter \$1.00 as nominal damages below. Please enter \$0 if you find that Sheri Minarsky did suffer an actual injury as a result of a hostile work environment. You will compensate Plaintiff for that deprivation in Question #6.

Nominal Damages: \$ _____

If you answered “\$0” to Question 5, please proceed to Question 6. If you answered “\$1” to Question 5, please proceed to Part II.

6. Under the law as given to you in the Court’s instructions, state the amount, if any, that you award to Sheri Minarsky against Susquehanna County for compensatory damages:

\$ _____

Proceed to Part II.

Part II

(To be supplied by Defendant Thomas Yadlosky)

Your deliberations have concluded.

After completing your deliberations, return your answers to these questions on the verdict form signed and dated by the jury foreperson to the Courtroom Deputy.

THE FOREPERSON MUST SIGN AND DATE THIS VERDICT FORM.

Date: _____

Foreperson

CERTIFICATE OF SERVICE

AND NOW, this 11th day of January, 2019, Dana M. Zlotucha, a member of the firm of Kreder Brooks Hailstone LLP, served the foregoing DEFENDANT SUSQUEHANNA COUNTY'S PROPOSED VERDICT SLIP upon the undersigned counsel by electronic mail at the following address(es):

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By: /s/ Dana M. Zlotucha